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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

3

10 SOFIA VELADORES, individually, and as
11 special administrator of the ESTATE OF
12 ROBERTO SANCHEZ, and as Guardian ad
Litem of D.S. and I.S. and Rogelio Sanchez,
individually.

Plaintiff,

Defendants.

CASE NO. 2:17-cv-0062-RFB-VCF

**STIPULATION AND ORDER TO
CONTINUE TRIAL**

(FIRST REQUEST)

20 Plaintiff, SOFIA VELADORES, by and through her attorney of record, Joseph C. Chu,
21 Esq. of the LADAH LAW FIRM, and Defendants LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT and OFFICER SOLON McGILL, by and through their attorneys of record,
23 Robert W. Freeman, Esq. of the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP hereby
24 request the continuance of the current trial date of Monday, June 13, 2022.

A. REASONS FOR REQUEST TO CONTINUE THE CURRENT TRIAL DATE

26 Attorneys for Plaintiffs are currently set to begin trial June 15, 2022 to June 24,
27 2022, on a **Firm Setting** in *Redekop v. Palmer*, Case No. A-18-786061-C,
28 Department 8. Attorney for Plaintiff is also scheduled to commence trial on July

18, 2022 until July 22, 2022, on a Firm Setting in *Rawlins v. Ignatowicz*, Case No. A-19-800094-C. Additionally, Attorney for Plaintiff will be preparing for trial which is set on a Firm Setting to commence on September 19, 2022 to October 28, 2022 in *Wilson v. Las Vegas Party Coach*, Case No. A-19-787765-C, in Department 32.

Attorneys for Defendant are preparing for trial in *Roberts v. USAA*, Case No. A-19-790757 set to begin on June 27, 2022. Additionally, counsel will be preparing for two trials set for August 8, 2022, *Sullivan v. Clark County*, 2:18-cv-825-GMN-DJA and *Christopher Clark v. SFMAIC*, A-19-804435-C. Counsel for defendants will be preparing for trial in *Calvin Hudson v. SFMAIC*, A-19-793385-C set to begin on October 10, 2022.

Defendants' expert witness is unavailable in June 2022.

B. PROPOSED TRIAL DATES

November 7, 2022

December 5, 2022

December 12, 2022.

This is the first request to continue trial date. The reasons for the extension constitute good faith and are made by both parties and are not for the purpose of undue delay.

DATED this 9th day of May, 2022.

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Robert W. Freeman

Robert W. Freeman, Jr., Esq.
Nevada Bar No. 3062
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants

DATED this 9th day of May, 2022.

LADAH LAW FIRM

/s/ Joseph C. Chu

Ramzy Paul Ladah, Esq.
Nevada Bar No. 11405
Joseph C. Chu, Esq.
Nevada Bar No. 11082
517 S. Third Street
Las Vegas, Nevada 89101

1 **ORDER**

2 I. **ACTION BY THE COURT**

3 (a) This case is set for court/jury trial on the fixed/stacked calendar on
4 12/05/2022 at 9:00 AM Calendar Call shall be held on 11/29/2022 at 1:30 PM.

5 (b) An original of the trial brief shall be electronically filed to the clerk on or before
6 11/28/2022.

7 (c) Jury Trials:

8 (1) An original of all instructions requested by either party
9 shall be electronically filed to the clerk for filing on or before: 11/23/2022.

10 (2) An original and two (2) copies of all suggested questions of the parties to be
11 asked of the jury panel by the Court on voir dire shall be submitted to the clerk for filing on or
12 before: 11/23/2022.

13 (d) Court Trials:

14 Not applicable.

15 (e) Counsel shall serve a copy of any trial brief, proposed findings of fact and
16 conclusions of law, proposed voir dire questions, and proposed jury instructions upon opposing
17 counsel contemporaneously with the filing thereof with the Court.

18 This order shall not be amended except by order of the Court pursuant to agreement of the
19 parties or to prevent manifest injustice.

20 IT IS SO ORDERED:



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RICHARD F. BOULWARE, II
22 UNITED STATES DISTRICT JUDGE

23 DATE: May 27, 2022

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